

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

MONICA HARTMAN

Case No.

Plaintiff,

v.

SOUTHERN HILLS PROPERTY GROUP

Defendant.

FIRST BANK

Garnishee.

**VERIFIED APPLICATION FOR WRIT OF GARNISHMENT**

Plaintiff-Garnishor and judgment creditor Monica Hartman, through the undersigned counsel, applies for a *Writ of Garnishment* against Garnishee First Bank pursuant to FED. R. CIV. P. 64 and TEX. R. CIV. P. 658. In support thereof, Plaintiff-Garnishor states as follows:

1. The Plaintiff-Garnishor is a natural person.
2. The Plaintiff-Garnishor was awarded a Judgment in this Court in an action entitled *Hartman v. Southern Hills Property Group*, No. 4:22-cv-00912-ALM in the amount of Twenty-Five Thousand Five Hundred Thirty-Five Dollars and Ninety Cents (\$25,535.90) on February 28, 2024. (ECF No. 15). Judgment was entered concurrently therewith. (ECF No. 15). A true and correct copy of the Judgment is attached hereto as **Exhibit "1"** and incorporated herein by reference.
3. The automatic stay for enforcement of a judgment imposed by FED. R. CIV. P. 62(a) has expired.
4. The Garnishee, First Bank, is a state-chartered bank with its Secretary of State designated Registered Agent of Brandon Anderson, and designated registered agent address

located at 4110 Kell Boulevard Wichita Falls, TX 76309. The Garnishee may be served with the *Writ of Garnishment* at that address.

5. As of the below date, exactly \$0 has been collected in satisfaction of the Judgment. Therefore, Plaintiff-Garnishor seeks payment of not less than the total amounts owing under the Judgment, as set forth in the Judgment. This judgment debt is just, due, and unpaid.

6. In accordance with the provisions of TEX. CIV. PRAC. & REM CODE § 63.001(3), within the Plaintiff-Garnishor's knowledge, the Defendant does not possess property in Texas subject to execution sufficient to satisfy the judgment debt.

7. Plaintiff-Garnishor has reason to believe, and does believe, that Garnishee is indebted to or has in hand effects and other property, including bank accounts, belonging to Defendant, as demonstrated by the verification of account letter attached hereto as **Exhibit "2"** and incorporated herein by reference. Plaintiff-Garnishor has reason to believe and does believe that Defendant holds one or more bank accounts with Garnishee.

8. The ABA routing number for the Garnishee is 111907788.

9. Plaintiff-Garnishor is not seeking to harass or injure the Garnishee or the Defendant by seeking issuance of a *Writ of Garnishment*.

10. Plaintiff-Garnishor requests that the Court waive any bond that might be required for the issuance of a *Writ of Garnishment*.

WHEREFORE PREMISES CONSIDERED, Plaintiff-Garnishor requests that the Court issue a Writ of Garnishment and that Plaintiff-Garnishor have judgment against Garnishee to satisfy the Judgment, together with all amounts set forth therein, as provided by law, together with all costs of court, and for such other and further relief to which Garnishor may be justly entitled.

RESPECTFULLY SUBMITTED AND DATED this April 1, 2024.

/s/ Andrew Roman Perrong

Andrew Roman Perrong (E.D. Tex. # 333687PA)

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*Attorney for Plaintiff*

**Verification (28 U.S.C. § 1746)**

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This verification is made pursuant to 28 U.S.C. § 1746.

Executed on: Apr 1, 2024

Monica Hartman

Monica Hartman (Apr 1, 2024 19:46 CDT)

Monica Hartman, Plaintiff-Garnishor